

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

WILBER HASTY,)	
)	
Plaintiff,)	
)	
v.)	No. 2:22-cv-04054-SRB
)	
CORIZON LLC., et al.,)	
)	
Defendants.)	

**MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT**

Plaintiff seeks leave to file a Second Amended Complaint. In support of this motion, Plaintiff states as follows:

1. The Court entered an order setting November 15, 2022, as the deadline to amend pleadings and add parties. This motion is timely.
2. Plaintiff has recently learned of significant changes to the corporate entities involved in these cases, as fully explained in the proposed amended complaint, which is attached.
3. Moreover, Plaintiff has recently learned of additional facts regarding the liability of Defendants Crane and Fields.
4. Plaintiff also comported the pleadings to the dismissal of various parties and the Court's previous ruling regarding Count III of the Amended Complaint.
5. Pursuant to Fed. Rule Civ. Pro. 15(2), "the court should freely give leave when justice so requires" as it does in this case.

WHEREFORE, for the reasons stated above, Plaintiff respectfully requests the Court to enter an order granting him leave to file the attached proposed Second Amended Complaint.

Dated: November 15, 2022

Respectfully submitted,

KHAZAELI WYRSCH, LLC

/s/ James R. Wyrsh

James R. Wyrsh, #53197

911 Washington Avenue, Suite 211

St. Louis, Missouri 63101

james.wyrsh@kwlawstl.com

Phone No. (314) 288-0777

Fax No. (314) 400-7701

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was filed electronically with the Court on November 15, 2022, to be served via the Court's electronic filing system on all counsel of record.

/s/ James R. Wyrsh